

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

IN RE:)
) Case No. 22-41362
KOBI GILKEY,)
) Chapter 13 Bankruptcy
Debtor.)

MOTION TO PURCHASE AUTOMOBILE AND NOTICE

NOTICE

WARNING: THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 14 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING, THE DATE OF WHICH WILL BE SENT TO YOU IF YOU FILE A RESPONSE. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS.

COMES NOW Debtor, by and through undersigned counsel, and for this Motion to Purchase Automobile, states to this Court as follows:

1. Debtor filed this Chapter 13 proceeding in the Eastern District of Missouri, Eastern Division, on May 5, 2022.
2. Debtor is surrendering his 2020 GMC Terrain to Santander through his First Amended Chapter 13 Plan, and is in need of reliable transportation.
3. Debtor would like to purchase an automobile with the following terms:
 - a. Approximate loan amount: \$20,198.00;
 - b. Estimated duration of payments: 72 months;

c. Estimated interest rate: 24.99%; and

d. Monthly payments not to exceed: \$499.99.

WHEREFORE, Debtor respectfully prays this Honorable Court allow the purchase of a vehicle with the above terms, or a similarly priced vehicle with similar terms, and for what other and further orders as this Court deems just and appropriate.

/s/Robert E. Faerber
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CERTIFICATE OF SERVICE

I certify that a true and correct copy of this Motion to Purchase Automobile was filed electronically on May 24, 2022 with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

Diana S. Daugherty (standing_trustee@ch13stl.com)
Office of U.S. Trustee (USTPRegion13.SL.ECF@USDOT.gov)

/s/Robert E. Faerber